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October 13, 2010

## VIA FEDERAL EXPRESS

TO: All Counsel on Attached Distribution List

Re: In the Matter of Certain Ground Fault Circuit Interrupters and Products Containing Same; U.S. ITC Complaint filed by Leviton Manufacturing Co. on September 3, 2010, Investigation number 337-TA-739

Leviton Manufacturing Co. v. Fujian Hongan Electric Co. Ltd., et al., United States District Court, Northern District of California, Civ. Action No. 3:10-cv-03961-WHA;

Leviton Manufacturing Co. Inc. v. Universal Security Instruments, Inc., and Shanghai Meihao Electric, Inc., v. Leviton Manufacturing Co., Inc. United States District Court of Maryland, Civ. Action No. 05-0889 AMD (Consolidated);

Leviton Manuf. Co., Inc. v. Greenberg Traurig LLP, Paul J. Sutton, Barry G. Magidoff, and Claude R. Narcisse, No. 09-cv-8083 (GBD) (S.D.N.Y.)

Leviton Manufacturing Co., Inc. v. Zhejiang Dongzheng Electric Co., et al., Civil Action Nos. 04-0424-JB/LFG, 04-1295-MCA/ACT, 05-0301-RLP/DJS (D.N.M.)

Leviton Manufacturing Co., Inc. v. HML Yuenqing Huameli Electronic Co., Ltd., Civ. Action No. 1:02-cv-00479-NGG-MDG (S.D.N.Y.)

## Ladies and Gentlemen:

We represent General Protecht Group, Inc. and related parties in connection with certain claims filed against them by Leviton Manufacturing Co.

By this letter, you and any parties you have represented in any of the above-referenced matters are hereby given notice to preserve and not destroy any and all evidence relating to the legal proceeding referred to above, or to the events, patents, products or other matters at issue in

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these legal proceedings. You and your clients shall not destroy, conceal or alter any paper or electronic files or other data generated by and/or stored on your or your client's computer systems and storage media (e.g., hard disks, floppy disks, backup tapes. This includes, but is not limited to: pleading files; deposition, hearing and trial transcripts; deposition, hearing and trial exhibits; documents produced by or to your clients during the discovery process; correspondence; patent prosecution documents; research and development documents; records of sales of GFCIs and products containing same; marketing documents related to GFCIs and products containing same; email and other electronic communications; word processing documents; spreadsheets; databases; calendars; telephone logs; contact manager information; offline storage or information stored on removable media; and information contained on laptops or other portable devices.

Through discovery we expect to obtain from you and from your clients a number of documents and other data, including files stored on your client's computers and storage media. In particular, we will seek information related to all of these legal proceedings; all of the patents that are the subjects of these legal proceedings; all of the patents related to the patents that are the subject of these legal proceedings; and research and development related to all of such patents.

This notice explicitly applies to any and all documents that Shanghai Meihao Electric Inc., Universal Security Instruments, Inc., or any other person or entity rely upon in support of their allegations of inequitable conduct relating to any patents assigned to Leviton Manufacturing Co., and to any and all documents that Leviton Manufacturing Co. relies upon in support of its claims that its attorneys committed legal malpractice or other breaches of duty to Leviton Manufacturing Co. related to patent prosecution or litigation.

You and your clients are expressly advised that any settlement of any currently pending legal proceedings may not be conditioned upon, or otherwise provide for, the destruction of any documents related to those legal proceedings, because you are now on notice that General Protecht Group and parties affiliated with it anticipate needing this evidence in the proceedings brought against them by Leviton.

If you believe that a protective order requires you to destroy or return to a producing party any documents identified above, please notify the undersigned immediately so an appropriate modification of that order can be obtained.

Electronic documents and the storage media on which they reside contain relevant, discoverable information beyond what may be found in printed documents. Therefore, even where a paper copy exists, we expressly preserve the right to seek all documents in their electronic form along with metadata for information about those documents contained on the media. We also expressly preserve the right to seek paper printouts of those documents that contain unique information created after they were printed (e.g., paper documents containing

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handwriting, signatures, marginalia, drawings, annotations, highlighting and redactions) along with any paper documents for which no corresponding electronic files exist.

The laws and rules prohibiting destruction of evidence apply to electronically-stored information in the same manner that they apply to other evidence. Due to its format, electronic information is easily deleted, modified or corrupted. Accordingly, you and your client must take every reasonable step to preserve this information until the final resolution of this matter. This may include, but would not be limited to, an obligation to discontinue all data destruction and backup tape recycling policies.

With regard to paper documents or electronic data created subsequent to the date of delivery of this letter, evidence should not be destroyed and your client is to take the appropriate steps required to avoid destruction of such evidence.

Please forward a copy of this letter to all persons and entities with custodial responsibility for the items referred to in this letter.

Failure to abide by this request could result in extreme penalties against your client and could form the basis of legal claims for spoliation.

If this correspondence is in any way unclear, please contact me immediately.

Sincerely yours,

SUTHERLAND ASBILL & BRENNAN

Ann G. Fort

Counsel for General Protecht Group, Inc.

AGF/pls